

From: Bacey, Juanita@DTSC
Sent: Thursday, April 07, 2016 5:50 PM
To: LEE, LILY
Subject: RE: Could you help with a few questions?

Th

Hi Lily,

Sorry, something came up and I didn't make it into the office. But I did eventually look at my email and tried to answer your questions.

1. Per Ryan, the regulatory agencies did not receive any reports with the questionable data. The incident was identified in October 2012. The regulatory agencies received the report about the anomalous soil samples in 2014. The samples that it refers to that were evaluated for discrepancies were collected from 2008 to 2014 (per the TTech report). The samples that were identified as being collected from other locations were collected in 2011 and 2012. I show no FSS reports being finalized in 2011 from Parcels C and E in Envirostor, though there were some in both Parcels in 2012. However, the TTech report indicates that two FSS reports with the questionable and new data were currently being drafted at that time (see report regarding trenches). So it appears that none of the FSS reports that were finalized in 2012 had the anomalous samples.

2014 TTech Report - anomalous soil samples

In Oct. 2014 The Navy inquired about the samples (3rd set of systematic samples) from building 517. Rasso thought the samples had been collected from different locations than the ones specified in the final FSS Report. The samples had been tested by the on-site lab and Test America so they knew it wasn't a lab error. This led to the Navy/TTech reviewing over 70,000 results since 2008. 2,500 samples were identified as meeting the criteria of low K-40. Samples were then compared to the previous sample set to see if they could determine if they were from the same area. They identified samples from 12 SUs that had a high potential for being collected from different locations (parcels C & E) and another 7 other SUs that had a potential. They evaluated all samples from the 12 SUs and 4 of the 7 SUs and determined all were from different locations. So all were re-sampled. All of the samples in question were originally collected in 2011 and 2012. TTech did note in the 2014 report that re-sampling revealed ROCs above the release criterion in some locations and they were subsequently remediated (e.g. Shack 79/80). Also, all suspect data, including anomalous soil sample data and gamma static survey results, were rejected.

All samples for building 351a were collected in 2002 and 2008. So it's likely that the 2008 samples were included in the evaluation for discrepancies. But the Navy should verify. Also, since it was the systematic samples that were in question, those are the ones they should be checking. Derek mentioned that they would check the confirmation samples when I spoke with him last.

The 351a FSS final report was issued in August 2010. So if the anomalous samples were from 2011 and 2012, we should be fine. Also this fits within the time period that T.S. supposedly worked at the site 2009-2012. He could have gotten the buildings mixed up. It was 5+ years ago.

2. I'm not sure about the work plans since the samples evaluated and found to be from different locations were collected in 2011 and 2012. So the work plan most likely came out in 2010 or 2011, or earlier. But I don't see how that is helpful since it appears they attempted to follow the work plan by collecting confirmation samples followed by systematic samples and then repeat if something is found. Then scan once all remediation is done. Per the TTech 2014 report, they were on the 3rd set of systematic samples. It seems likely that they were trying to meet a deadline and didn't want to have to do further remediation. I'll search through Envirostor though.

This new accusation of anomalous samples from under building 351a may not have been reviewed/evaluated as part of the 2012 investigation. We just need to confirm if the Navy evaluated all samples through 2008.

Nina

From: LEE, LILY [LEE.LILY@EPA.GOV]
Sent: Thursday, April 07, 2016 9:15 AM
To: Bacey, Juanita@DTSC
Subject: Could you help with a few questions?

Dear Nina,

Thank you so much for offering to help. I have 2 research tasks that I haven't gotten to re anomalous soil samples:

1 – I got this question from my mgmt - So 2 yrs ago the regulators had not yet gotten any reports that contained the results from the wrong locations. So at that time, no regulatory decisions had been made based on those. Have we gotten some now? I found the attached map showing locations of anomalous samples. I also cut & pasted my own tracking list of reviews. I meant to go through & compare but I haven't done that yet. You may be able to remember off the top of your head because you track these more closely.

2 – What were the workplan requirements at the time of the anomalous samples? I found the 2015 workplan and the SUPRA for 2013 Parcel C that I received directly. I'll send you a separate email with those attached. I found hard copy in my cube from Craig of the 2013 version. But I didn't find the version that would apply to the time of the anomalous samples. I looked in Envirostor & the EPA Superfund Records Ctr, and I couldn't find it. Since you have such good files, do you have it?

I'd appreciate your help on these if you have the time. No particular deadline.

Lily Lee
Cleanup Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St. (SFD-8-3)
San Francisco, CA 94105
Tel: 415-947-4187, Fax: 415-947-3518
www.epa.gov/region9/superfund